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*Attorney for Defendants*

**IN THE UNITES STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

JEREMY BAUMAN, individually and on  
behalf of all persons similarly situated,

Plaintiffs,

adv.

V THEATER GROUP, LLC SAXE  
MANAGEMENT LLC, DAVID SAXE,  
DOES I through X inclusive, and ROE  
CORPORATIONS I through X, inclusive,

Defendants.

Case No. \_\_\_\_\_

**PETITION FOR REMOVAL**

Defendants, V THEATER GROUP, LLC SAXE MANAGEMENT LLC, and DAVID  
SAXE, by and through their attorneys PITEGOFF LAW OFFICE and JEFFREY I. PITEGOFF,  
ESQ., hereby provide notice of its intent to remove this matter from the Eighth Judicial District  
Court of the State of Nevada to the Federal District Court for the District of Nevada pursuant to  
28 USC Sec. 1441. As described in greater detail below, the basis for Defendant's Petition for

1 Removal is that the case meets the requirements for Federal Jurisdiction under 29 USC 1331 by  
2 virtue of a federal question having been asserted. All Defendants have agreed to removal.

- 3
- 4 1. On June 12, 2014, Plaintiff caused the attached Complaint to be filed in the  
5 Eighth Judicial District Court, in and for the County of Clark. *See* Exhibit A.
- 6 2. On June 16, 2014, Plaintiff was issued a Summons from the Eighth Judicial  
7 District Court.
- 8 3. On June 19, 2014, Plaintiff caused the Complaint attached hereto as Exhibit A to  
9 be personally served upon all Defendants.
- 10 4. The Complaint is based, in part, upon allegations of a breach of federal law, to  
11 wit, the Telephone Consumer Protection Act (1991), 42 U.S.C. sec. 227.

12  
13 DATED this 9<sup>th</sup> day of July, 2014

14 PITEGOFF LAW OFFICE

15  
16 /s/Jeffrey I. Pitegoff  
Jeffrey I. Pitegoff, Esq.

17  
18 **Certification of all Defendants for Removal**

19 All Defendants named and served herein, whether a proper party or otherwise, are  
20 currently represented by the undersigned counsel and all consent to the removal of this action to  
21 this Court and have authorized this action.

22  
23 /s/ Jeffrey Pitegoff, Esq.  
24 Jeffrey I. Pitegoff  
Pitegoff Law Office  
25 415 South 6<sup>th</sup> Street, Suite 300  
26 Las Vegas, Nevada 89101  
27 (702) 333-1936  
28

**Certificate of Service**

I hereby Certify that, pursuant to FRCP Rule 5(b)(3) and this Court's Special Order 109,  
a true and correct copy of the forgoing document was served today via the Court's CM/ECF  
electronic filing system upon the following individuals:

Marquis Aurbach Coffing

Phillip S. Aurbach, Esq.  
Candace E. Renka, Esq.  
*Attorneys for Plaintiffs*

Dated this 9<sup>th</sup> Day of July 2014

/s/ Jeffrey Pitegoff, Esq.